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9	Attorneys for Plaintiffs and the Class	
10	UNITED STATES DISTRICT COURT	
11	NODTHEDN DICTRICT OF CALIFORNIA	
12	NORTHERN DISTRICT OF CALIFORNIA	
13	OAKLAND DIVISION	
14	DOE 1, DOE 2, and KASADORE RAMKISSOON, on Behalf of	CASE NO. C 06-5866 SBA
15	Themselves and all other Persons	
16	Similarly Situated, Plaintiffs,	Honorable Saundra Brown Armstrong
17	ĺ (JOINT STIPULATION and ORDER FOR EXTENSION OF EXPERT
18	v.)	DISCOVERY
19	AOL LLC,	
20	Defendant.	
21		
22		
23		
24		
25		
26		
27	[C 06-5866 SBA] JOINT STIPULATION and	
28	JOINT STIPULATION and [PROPOSED] ORDER FOR EXTENSION OF EXPERT DISCOVERY	

[C 06-5866 SBA] JOINT STIPUL

[PROPOSED] ORDER FOR EXTENSION OF EXPERT

DISCOVERY

RECITALS

WHEREAS Plaintiffs' deadline to designate experts is December 23, 2010, Defendant's deadline to designate experts is February 10, 2011, rebuttal disclosures are due on March 10, 2011, and the expert discovery deadline is March 24, 2011.

WHEREAS, subject to approval by the Court the parties have agreed to the modification of the expert discovery schedule which provides plaintiffs an additional 7 days until December 30, 2010 to designate experts, Defendant's deadline to designate experts is extended by 7 days until February 17, 2011, Plaintiffs will have an additional day to file their rebuttal report until March 11, 2011, and the expert discovery deadline will be extended by one day to March 25, 2011.

WHEREAS the requested time modification would not have any other effect on the schedule for the case.

WHEREAS Plaintiffs previously filed an unopposed motion to extend each of the expert discovery deadlines by twenty (20) days, which the Court granted on November 30, 2010.

IT IS THEREFORE STIPULATED by and between the parties, acting through their counsel of record, that, subject to the Court's approval, Plaintiffs' deadline to designate experts is extended by 7 days until December 30, 2011, Defendant's deadline to designate experts is extended by 7 days until February 17, 2011, Plaintiffs will have an additional day until March 11, 2011 to make rebuttal disclosures, and the expert discovery deadline will be extended by one day to March 25, 2011.

1 SO STIPULATED 2 3 December 28, 2010 Dated: 4 5 /s/ Nathaniel L. Orenstein /s/ Joseph Serino, Jr. 6 Joseph J. Tabacco, Jr. (75484) Joseph Serino, Jr. Christopher T. Heffelfinger (118058) Andrew G. Horne **BERMAN DeVALERIO** Adam L. Fotiades One California Street, Suite 900 David S. Flugman San Francisco, California 94104 All admitted pro hac vice Telephone: (415) 433-3200 KIRKLAND & ELLIS LLP Facsimile: (415) 433-6382 601 Lexington Avenue 10 New York, New York 10022 Manuel J. Dominguez (pro hac vice) Telephone: (212) 446-4800 C. Oliver Burt, III 11 Facsimile: (212) 446-4900 **BERMAN DeVALERIO** 4280 Professional Center Drive, Suite 350 -- and --Palm Beach Gardens, Florida 33410 Telephone: (561) 835-9400 13 Elizabeth L. Deeley (230798) Facsimile: (561) 835-0322 KIRKLAND & ELLIS LLP 14 555 California Street Nathaniel L. Orenstein (pro hac vice) San Francisco, California 94104 15 BERMAN DeVALERIO 1 Liberty Square 16 Boston, Massachusetts 02109 Attorneys for Defendant Telephone: (617) 542-8300 Facsimile: (617) 542-1194 17 18 Richard R. Wiebe (121156) LAW OFFICE OF RICHARD R. WIEBE One California Street, Suite 900 19 San Francisco, California 94111 Telephone: (415) 439-1400 20 Facsimile: (415) 439-1500 21 James K. Green JAMES K. GREEN, P.A. 22 222 Lakeview Avenue, Suite 1650 West Palm Beach, Florida 33401 23 Attorneys for Plaintiffs 24 25 26 [C 06-5866 SBA] 27 JOINT STIPULATION and [PROPOSED] ORDER FOR 28 **EXTENSION OF EXPERT**

DISCOVERY

E-Filing Attestation 1 I, Nathaniel L. Orenstein, am the ECF User whose ID and password are being used to file 2 this document. In compliance with General Order 45 X.B, I hereby attest that the signatory identified below concurred in its filing. 3 /s/Nathaniel L. Orenstein 4 Nathaniel L. Orenstein (Pro Hac Vice) 5 6 KIRKLAND & ELLIS LLP 7 By: _/s/ Joseph Serino, Jr. 8 Joseph Serino, Jr. (Pro Hac Vice) 9 Joseph Serino, Jr. 10 Andrew G. Horne David S. Flugman 11 Adam Fotiades all admitted pro hac vice 12 601 Lexington Avenue New York, New York 10022 13 Telephone: (212) 446-4800 Facsimile: (212) 446-4900 14 jserino@kirkland.com Email: ahorne@kirkand.com 15 dflugman@kirkland.com afotiades@kirkland.com 16 Elizabeth L. Deeley 17 555 California Street San Francisco, California 94104 18 Telephone: (415) 439-1400 Facsimile: (415) 439-1500 19 Email: edeeley@kirkland.com 20 Attorneys for AOL LLC 21 22 **ORDER** PURSUANT TO STIPULATION, IT IS SO ORDERED. 23 24 Dated: 12/27/10 THE HONORABLE SAUNDRA BARMSTRONG 25 UNITED STATES DISTRICT JUDGE 26 27 [C 06-5866 SBA] JOINT STIPULATION and 28 [PROPOSED] ORDER FOR EXTENSION OF EXPERT

DISCOVERY